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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

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Dear Mr. Caton:

On behalf of Capital Cities/ABC, Inc., transmitted herewith for filing with the Commission are an original and four copies of its Reply Comments in MM Docket No. 96-62.

If there are any questions in connection with the foregoing, please contact the undersigned.

Very truly yours,

David Cohen
General Attorney

DC/ak
Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Amendment of Part 73 of)
the Commission's Rules to More)
Effectively Resolve Broadcast)
Blanketing Interference, Including)
Interference to Consumer Electronics and)
Other Communications Devices)

MM Docket No. 96-62

To: The Commission

REPLY COMMENTS OF CAPITAL CITIES/ABC, INC.

Introduction

Capital Cities/ABC, Inc. ("CC/ABC"), a wholly-owned subsidiary of The Walt Disney Company, hereby submits its reply comments in response to the Commission's Notice of Proposed Rulemaking ("Notice") in the above-captioned proceeding. CC/ABC is the licensee of 10 television and 21 radio (11 AM; 10 FM) stations.

I. AM BLANKETING CONTOUR

We agree with the comments filed by the consulting engineering firm of Hammett and Edison, Inc., regarding the appropriateness of the 1 V/m contour as establishing the contour for AM blanketing. Additionally, we support the Commission's proposed method of establishing the 1 V/m blanketing contour of a directional AM antenna array by the vector summation of the computed inverse fields of each element in the array, and believe this to be a reasonable approach.

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II. TV BLANKETING CONTOUR

We agree with the comments filed by the National Association of Broadcasters (NAB) regarding the lack of evidence to support the need to establish a blanketing contour for TV and do not feel the need to establish a TV blanketing contour at this time. Furthermore, the method proposed in the NPRM of using the station's maximum ERP to compute the distance to the blanketing contour fails to take into account the vertical elevation pattern of TV broadcast antennas, especially high gain UHF antennas, which radiate less power at depression angles close to the antenna site. The distances computed to the blanketing contour of a high power UHF station using the method proposed in the NPRM would yield what we believe to be an unrealistically large area of blanketing interference. We urge the Commission not to adopt the new rules because they would impose additional burdens on broadcasters and are not clearly supported by the need to do so. We therefore urge the Commission not to adopt a TV blanketing contour until a clear need is demonstrated and a reasonable approach to establishing the distance to the contour is provided.

III. FM BLANKETING CONTOUR

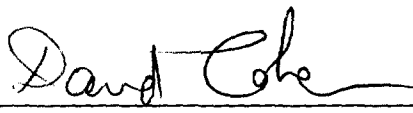
We believe that the Rules defining a licensee's responsibility to resolve blanketing interference complaints should be clarified to make plain that minor modifications to FM antennas will not trigger a new one-year period of station responsibility for correcting such complaints. Licensees must be able to repair and replace antennas as normal maintenance that does not require the filing of an Application for Construction Permit (FCC form 301), but only, at most, an Application for Modification of License (FCC Form 302). Otherwise, an undue

burden would be placed on licensees whenever repairs or minor changes are made which are unlikely to trigger new legitimate complaints of blanketing interference. It should be noted that many new replacement antennas are deliberately designed to minimize downward radiation close to the antenna supporting structure.

IV. DURATION OF RESPONSIBILITY

We endorse the comments of the NAB and Hammett and Edison with regard to the fairness of not expanding the length of time that broadcasters will remain responsible for the blanketed area of an AM or FM signal. Broadcasters have no control over the design and manufacture of consumer electronic products so that it would be unfair to hold broadcasters responsible for improper performance of such products, which is all too often due to inadequate design. One year is plenty of time to find problems caused by a material change in broadcast facilities; additional time simply makes broadcasters responsible for problems caused by others.

Respectfully submitted,

By: 
Sam Antar
Vice President, Law & Regulation

David Cohen
General Attorney, Law & Regulation

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July 24, 1996